

3. At the time the First Joint Motion was filed, none of the deadlines in the Scheduling Order had passed. At this juncture, however, one of the deadlines has passed and several more are approaching:

- January 4: Relators' expert disclosures (*expired*)
- February 4: Defendants' expert disclosures
- March 7: Discovery deadline
- March 21: *Daubert* motion deadline
- April 21: dispositive judgment motion deadline

See ECF No. 94 ¶1, 2, 5, 7, 8.

4. Accordingly, the parties request a brief status conference as soon as practicable to answer any concerns the Court may have about the First Joint Motion and to urge their joint request for entry of the proposed Agreed Second Amended Scheduling Order.

5. Alternatively, should the Court grant the First Joint Motion and enter the Agreed Second Amended Scheduling Order, the parties believe a status conference would not be necessary.

DATED: January 28, 2022.

Respectfully submitted,

DAVIS & SANTOS, PLLC

By: /s/ Caroline Newman Small

Jason M. Davis

State Bar No. 00793592

Email: jdavis@dslawpc.com

Jay Hulings

State Bar No. 24104573

Email: jhulings@dslawpc.com

Caroline Newman Small

State Bar No. 24056037

Email: csmall@dslawpc.com

719 S. Flores Street
San Antonio, Texas 78204

Tel: (210) 853-5582

Fax: (210) 200-8395

***Counsel for Defendants JXM, Inc. and
Margaux I. Ximenes***

SHAW LAW PLLC

By: /s/Ronald J. Shaw

Ronald J. Shaw

State Bar No. 18152300

Email: attorney@shawlawpllc.com

5150 Broadway, Unit 619

San Antonio, Texas 78209

Tel: (210) 227-3737

Fax: (210) 366-0805

***Counsel for Defendants Main Building
Maintenance, Inc., Elvira H. Ximenes, and
Robert A. Ximenes***

GREENE, LLP

By: /s/Michael Tabb

Thomas M. Greene

Mass. BBO # 210020 *pro hac vice*

tgreene@greenellp.com

Michael Tabb

Mass. BBO # 491310 *pro hac vice*

matabb@greenellp.com

Ryan P. Morrison

Mass. BBO # 680238 *pro hac vice*

rmorrison@greenellp.com

Tucker D. Greene

Mass. BBO # 682943 *pro hac vice*

tucker.greene@greenellp.com

One Liberty Square, Suite 1200

Boston, MA 02109

(617) 261-0040 (Telephone)

(617) 507-6559 (Facsimile)

Counsel for Plaintiffs-Relators

CERTIFICATE OF SERVICE

I certify that on the January 28, 2022, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Caroline Newman Small
Caroline Newman Small